

## REMARKS/ARGUMENTS

The above Amendments and these Remarks are in reply to the Office Action mailed July 14, 2006.

### **I. Summary of Examiner's Rejections**

Claims 1-6, 9-14, 17-22, 33-38, 41-46 and 49-66 were pending in the Application prior to the outstanding Final Office Action. In the Office Action, claims 1, 3-4, 9, 11-12, 17, 19-20, 33, 35-36, 41, 43-44, 49, 50-55, 57-58, 61-62, and 64-65 were rejected under 35 U.S.C. §102(e) as being anticipated by Hotti et al. (U.S. Patent No. 6,970,876). Claims 2-3, 5-6, 10-11, 13-14, 18-19, 21-22, 34-35, 37-38, 42-43, 45-46, 56-57, 59-60, 63-63 and 66 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hotti (U.S. Patent No. 6,970,876) in view of Wotring et al. (U.S. Patent No. 6,665,677).

### **II. Summary of Applicant's Amendments**

The present Response cancels Claims 9-14, 17-22, 33-38, 41-46, 50-52, 55, 61, and 63-66 without prejudice and without disclaimer of the subject matter disclosed therein. The present Response amends claims 1-4, 53-54, 56-58, 60 and 62 and adds claims 67-99, leaving for the Examiner's present consideration claims 1-6, 49, 53-54, 56-60, 62, and 67-99. Reconsideration of the claims in light of the following arguments is respectfully requested. Applicant reserves the right to prosecute any originally presented or withdrawn claims in a continuing or future application.

### **III. Claims rejected under 35 U.S.C. §102(e)**

In the Office Action, Claims 1, 3-4, 9, 11-12, 17, 19-20, 33, 35-36, 41, 43-44, 49, 50-55, 57-58, 61-62, and 64-65 were rejected under 35 U.S.C. §102(e) as being anticipated by Hotti et al. (U.S. Patent No. 6,970,876).

#### **Claim 1**

Claim 1 has been amended by the present Response to more clearly define the embodiment therein. As amended, Claim 1 defines:

1. (Currently Amended) A method of managing a virtual content repository (VCR) that represents a plurality of content repositories, the method comprising:  
creating a content node for each of the plurality of content repositories and associating each content node with its own content schema, wherein each of the plurality of content repositories is unique;

creating a hierarchy of hierarchy nodes in the VCR, and for each hierarchy node comprising the substeps of:

- indicating a location of the hierarchy node in the hierarchy by an identifier;
- relating the hierarchy node to a type of content;
- associating the hierarchy node with one or more content nodes; and
- associating the hierarchy node with its own hierarchy schema;

storing the hierarchy and content nodes in the VCR, resulting in storing each schema in one of the plurality of content repositories; and

presenting the plurality of content repositories associated with the VCR as a single content repository to an application program interface.

Hotti discloses management of distributed databases, in which a configuration management node 231 manages configuration management replicas 203, 213 and 223 in each part 201, 211, and 221 of the distributed database system 200. *Master database node 202 and replica database nodes 212, 222* form a distributed system, wherein the application replica database nodes can maintain a full or partial copy (replica) of the application master database servers' data. A hierarchical system is defined where several database systems a, b, c have their respective schema management nodes, 931a, 931b and 931c, which are replicas of the master database common configuration management node 931. (Abstract; Fig. 2A; col. 6, lines 6-10, 17-21; col. 3, 56-57; col. 9, lines 18-27; Fig. 9)

Independent Claim 1 has been amended to require that *each of the plurality of content repositories is unique*. In the present application, one example of different types of content are newspaper archives, advertisements, inventories, image collections, etc. (para. 0013). Collectively, this plurality of content repositories forms the virtual content repository. No replication of repositories is involved. The advantages of a virtual content repository include allowing integration of more than one vendor's content repository into one repository, as each vendor may have its own proprietary API, conventions for manipulating content, and data formats. Hotti, on the other hand, discloses *one repository or database*, such that one set of data, or *one type of content*, is replicated from the database to other empty database nodes.

Claim 1 has also been amended to require creating a hierarchy of *hierarchy nodes* in the VCR comprising the substep of *relating each hierarchy node to a different type of content*. This hierarchy of hierarchy nodes is needed to organize or group together different types of content. For example, Fig. 7 shows a Virtual Content Repository (VCR) having four hierarchy nodes with corresponding content types of "HR," "Images," "Marketing," and "Products." In Hotti, however, the hierarchy of nodes disclosed is different. Because a master configuration management node is replicated to replica nodes, Hotti discloses just one type of content, which is the content of the one master database that is replicated to other replica databases. Thus, Hotti does not disclose relating each hierarchy node to a different type of content.

Claim 1 has also been amended to require creating a content node for each of the plurality of content repositories and *associating each hierarchy node with one or more content nodes*. For example, Fig. 8 shows a “Products” hierarchy node having four *content nodes* 806, “Laptop,” “PocketPC,” “Server,” and “Wireless Card.” The hierarchy node content type is “Products.” As each hierarchy node is also related to a different type of content, associated content nodes can be thought of as related to sub-types of the hierarchy node’s content type. The office action states that in Hotti a hierarchic system where several database systems a, b, c have their respective schema management nodes reads on both “creating a hierarchy of hierarchy nodes” and “creating a content node for each of the plurality of content repositories,” as required by Claim 1. Thus, Hotti does not differentiate between content nodes and hierarchy nodes. Further, as mentioned above, the master configuration management node is replicated to these replica schema management nodes. Thus, Hotti teaches one type of node. Hotti therefore does not teach associating each hierarchy node with one more content nodes.

Claim 1 has also been amended to require presenting the plurality of content repositories associated with the VCR *as a single content repository* to an application program interface. A virtual content repository (VCR) is a logical representation of one or more individual content repositories such that they appear and behave as a single content repository from an application program’s standpoint (para. 0030). As mentioned above, each of the plurality of content repositories is unique. As the replica databases in Hotti are replicas of a master database, there is no reason to combine the databases in order to present them as one database to an application program.

Thus, Hotti does not disclose or suggest that each of the plurality of content repositories is unique; creating a hierarchy of hierarchy nodes in the VCR comprising the substep of relating each hierarchy node to a different type of content; creating a content node for each of the plurality of content repositories and associating each hierarchy node with one or more content nodes; storing the hierarchy and content nodes in the VCR, resulting in storing each schema in one of the plurality of content repositories; and presenting the plurality of content repositories associated with the VCR as a single content repository to an application program interface, as required by Claim 1. For at least these reasons, Claim 1 is neither anticipated by, nor obvious in view of Hotti. Applicant respectfully requests reconsideration of the claim.

#### **Claim 9**

Claim 9 has been canceled by the present Response, rendering moot the rejections of this claim.

**Claim 53**

The comments provided above with respect to Claim 1 are hereby incorporated by reference. Claim 53 has been similarly amended to more clearly define the embodiment therein. For similar reasons, as provided above with respect to Claim 1, Applicant respectfully submits that Claim 53, as amended, is likewise neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested.

**Claims 3, 11, 19, 35, 43, 57 and 64**

Claims 3 and 57 have been amended so that they no longer optional claims. The present Response changes these claims from “can be” to “comprises one of.” Claims 11, 19, 35, 43 and 64 have been canceled by the present Response, rendering moot the rejections of these claims.

**Claim 17, 33 and 41**

Claims 17, 33 and 41 have been canceled by the present Response, rendering moot the rejections of these claims.

**Claims 12, 20, 36, 44, 50-52, 55, 61 and 65**

Claims 12, 20, 36, 44 50-52, 55, 61 and 65 have been canceled by the present Response, rendering moot the rejections of these claims.

**Claims 4, 49, 54, 58 and 62**

Claims 4, 49, 54, 58 and 62 are not addressed separately, but it is respectfully submitted that these claims are allowable in view of the comments provided above. Applicant respectfully submits that these claims are similarly neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested. It is also submitted that these claims also add their own limitations which render them patentable in their own right. Applicant respectfully reserves the right to argue these limitations should it become necessary in the future.

**VII. Claims rejected under 35 U.S.C. §103(a)**

Claims 2-3, 5-6, 10-11, 13-14, 18-19, 21-22, 34-35, 37-38, 42-43, 45-46, 56-57, 59-60, 63-64 and 66 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hotti (U.S. Patent No. 6,970,876) in view of Wotring et al. (U.S. Patent No. 6,665,677).

**Claims 2-3, 5-6, 56-57, 59-60**

Claims 2-3, 5-6, 56-57 and 59-60 are not addressed separately, but it is respectfully submitted that these claims are allowable in view of the comments provided above. Applicant respectfully submits that these claims are similarly neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested. It is also submitted that these claims also add their own limitations which render them patentable in their own right. Applicant respectfully reserves the right to argue these limitations should it become necessary in the future.

**Claims 10-11, 13-14, 18-19, 21-22, 34-35, 37-38, 42-43, 45-46, 63-64 and 66**

Claims 10-11, 13-14, 18-19, 21-22, 34-35, 37-38, 42-43, 45-46, 63-64 and 66 have been canceled by the present Response, rendering moot the rejections of these claims.

**VII. Other Claims**

Claims 67-99 have been newly added by the present Response. Applicant respectfully submits that no new matter is being added in new Claims 67-99 and respectfully requests that these claims be considered herewith.

**VIII. Conclusion**

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application should be allowable, and reconsideration of the claims is respectfully requested. The Examiner is respectfully requested to telephone the undersigned if she can assist in any way in expediting issuance of a patent.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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